

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PAFFORD TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T4-15(a))
(May 3, 2000)

The United States Postal Service hereby provides the response of witness Pafford to the following interrogatory of United Parcel Service (UPS):
UPS/USPS-T4-15(a), filed on April 11, 2000.

The Postal Service filed an objection to this interrogatory on April 27, 2000. After discussion among counsel for the Postal Service and UPS, the Postal Service has agreed to withdraw its objection while UPS has agreed to accept a response just to part (a) of the interrogatory.


The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Kenneth N. Hollies

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T4-15. Refer to Library Reference USPS-LR-I-275, the Postal Service's Cost and Revenue Analysis for Fiscal Year 1999.

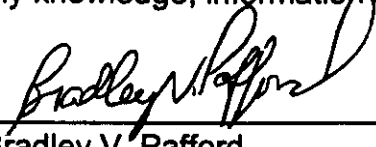
(a) Confirm that the parcel post revenue estimate of \$1,020.9 million and the parcel post volume estimate of approximately 319 million pieces are based on combined DRPW and BRPW (and other source data, if any) estimates. If not confirmed, explain.

RESPONSE:

(a) Confirmed.

DECLARATION

I, Bradley V. Pafford, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.



Bradley V. Pafford

Date: May 3, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

K N Hollies

Kenneth N. Hollies

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May 3, 2000